

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

IN RE:

PABLO VELAZQUEZ RIVERA

(DEBTORS)

CASE NO. 10-08895 BKT

CHAPTER 13

**INFORMATIVE MOTION
(AMENDED PLAN)**

TO THE HONORABLE COURT:

Comes now Debtor, represented by the undersigned attorney, and represents as follows:

1. Debtor informs of the separate filing of Amended Plan:

a. Amended Plan: to surrender collateral to lien holder Popular Auto (2009 jeep Grand Cherokee; contract no. xxx-xxx-xxxxx-xx-x0378) and to lifts the stay in favor of secured creditor Firstbank of Puerto Rico over property located at Condominio The Residences, Blvd Media Luna, APT 1433 Carolina, PR (POC #1).

WHEREFORE, Debtor prays from this Honorable Court to take notice and allow filing of the amended plan.

RESPECTFULLY SUBMITTED.

NOTICE: Within twenty eight (28) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

CERTIFICATE OF SERVICE: I hereby certify that on this same date I electronically filed the above document with the Clerk of the Court using the CM/ECF System which will send a notification of such filing to all C/MECF participants in this case, including: U.S. Trustee, and

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to the Assistant U.S. Trustee. Furthermore, I hereby certify that I mailed this document by First Class Mail postage prepaid to the non CM/ECF participants included in the attached master address list.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, February 7, 2011.

s/JOSE L. JIMENEZ QUINONES

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United States Bankruptcy Court
District of Puerto Rico

IN RE:

Case No. 10-08895

VELAZQUEZ RIVERA, PABLO

Chapter 13

Debtor(s)

AMENDED CHAPTER 13 PAYMENT PLAN

1. The future earnings of the Debtor(s) are submitted to the supervision and control of the Trustee and the Debtor(s) shall make payments to the Trustee ☒ directly ☐ by payroll deductions as hereinafter provided in the PAYMENT PLAN SCHEDULE.
2. The Trustee shall distribute the funds so received as hereinafter provided in the DISBURSEMENT SCHEDULE.

PLAN DATED: _____

☒ AMENDED PLAN DATED: 2/07/2011

☐ PRE ☐ POST-CONFIRMATION

Filed by: ☒ Debtor ☐ Trustee ☐ Other

I. PAYMENT PLAN SCHEDULE

\$ 800.00 x 60 = \$ 48,000.00
\$ _____ x _____ = \$ _____
\$ _____ x _____ = \$ _____
\$ _____ x _____ = \$ _____
\$ _____ x _____ = \$ _____

TOTAL: \$ 48,000.00

Additional Payments:

\$ _____ to be paid as a LUMP SUM
within _____ with proceeds to come from:

☐ Sale of Property identified as follows:

☐ Other:

Periodic Payments to be made other than, and in
addition to the above:

\$ _____ x _____ = \$ _____

PROPOSED BASE: \$ 48,000.00

III. ATTORNEY'S FEES
(Treated as § 507 Priorities)

Outstanding balance as per Rule 2016(b) Fee
Disclosure Statement: \$ _____

Signed: /s/ PABLO VELAZQUEZ RIVERA
Debtor

Joint Debtor

II. DISBURSEMENT SCHEDULE

A. ADEQUATE PROTECTION PAYMENTS OR _____ \$ _____

B. SECURED CLAIMS: .

☐ Debtor represents no secured claims.

☒ Creditors having secured claims will retain their liens and shall be paid as follows:

1. ☐ Trustee pays secured ARREARS:

Cr. _____ Cr. _____ Cr. _____
_____ # _____ # _____
\$ _____ \$ _____ \$ _____

2. ☒ Trustee pays IN FULL Secured Claims:

Cr. RES. OWNERS ASS Cr. _____ Cr. _____
XXXXXX1433 # _____ # _____
\$ 615.75 \$ _____ \$ _____

3. ☐ Trustee pays VALUE OF COLLATERAL:

Cr. _____ Cr. _____ Cr. _____
_____ # _____ # _____
\$ _____ \$ _____ \$ _____

4. ☒ Debtor SURRENDERS COLLATERAL to Lien Holder:

POPULAR AUTO

5. ☐ Other:

6. ☐ Debtor otherwise maintains regular payments directly to:

C. PRIORITIES: The Trustee shall pay priorities in accordance with the law.

11 U.S.C. § 507 and § 1322(a)(2)

D. UNSECURED CLAIMS: Plan ☐ Classifies ☒ Does not Classify Claims.

1. (a) Class A: ☐ Co-debtor Claims / ☐ Other: _____

☐ Paid 100% / ☐ Other: _____

Cr. _____ Cr. _____ Cr. _____
_____ # _____ # _____
\$ _____ \$ _____ \$ _____

2. Unsecured Claims otherwise receive PRO-RATA disbursements.

OTHER PROVISIONS: (Executory contracts; payment of interest to unsecureds, etc.)
See Continuation Sheet

Attorney for Debtor JIMENEZ - QUINONES LAW OFFICES

Phone: (787) 282-9009

AMENDED CHAPTER 13 PAYMENT PLAN
Continuation Sheet - Page 1 of 1

1. DEBTOR HEREBY LIFTS THE STAY IN FAVOR OF EUROBANK (NOW ORIENTAL FINANCIAL GROUP) IN THE TWO MOTOR VEHICLE LOANS: (1) ACC. # 9800, 2005 NISSAN ALTIMA IN POSSESSION OF DEBTOR'S SPOUSE, MYRIAM HERNANDEZ VAZQUEZ, AND (2) ACC. # 3464, 2006 NISSAN SENTRA IN POSSESSION OF SPOUSES' DAUGHTER: JENNIFER LACOMBA.
2. ANY INCOME TAX REIMBURSEMENTS WILL BE DEVOTED TO FUND THE PLAN. THE BASE SHALL BE ADJUSTED UPWARDS AUTOMATICALLY UPON ANY DEPOSITS FROM THESE REIMBURSEMENTS. DEBTOR SHALL REQUEST THE AUTHORIZATION OF THE COURT BEFORE USING ANY FUNDS
3. FEES PAID IN ADVANCE TO DEBTOR'S ATTORNEY \$3,000. RULE 2016 BALANCE OUTSTANDING = \$0.00.
4. THE AUTOMATIC STAY IS LIFTED IN FAVOR OF SECURED CREDITOR FIRSTBANK OF PUERTO RICO OVER THE PROPERTY LOCATED AT CONDOMINIO THE RESIDENCES, BLVD MEDIA LUNA, APT. 1433, CAROLINA, PUERTO RICO. (POC #1)

VELAZQUEZ RIVERA PABLO
THE RESIDENCES PARQUE ESCORIAL
BLVD MEDIA LUNA APTO 1433
CAROLINA PR 00987

COOPER VISION
PO BOX 145409
CINCINNATI OH 45250-5409

INFINITY EYE WORKS
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ARECIBO PR 00613

A - OPTICAL
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DEPARTAMENTO DE HACIENDA
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SAN JUAN PR 00902-2501

J&J MEDICAL CARIBBEAN
ZONA IND LOS FRAILES ST C # 475 SUITE
GUAYNABO PR 00969

ABB CONCISE
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CORAL SPRINGS FL 33065

DEPARTMENT OF THE TREASURY
INTERNAL REVENUE SERVICE
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GUAYNABO PR 00968-8000

JESUS M RIVERA DELGADO
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SAN JUAN PR 00931

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PO BOX 2058
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FIRST MEDICAL
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PLAINVILLE MA 02762-0538

MGM LAB
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SAN JUAN PR 00920

MGM/ RAINBOU
AVE DE DIEGO 621 PUERTO NUEVO
SAN JUAN PR 00920

THE COMMERCIAL COLLECTION CORP
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ROSELLE IL 60172

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GUAYNABO PR 00969

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POPULAR AUTO
NEW MANAGEMENT GROUP
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SAN JUAN PR 00936-2708

QUANTUM OPTICS
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LOS ANGELES CA 90074-9784

RES OWNERS ASSOC
PARQUE ESCORIAL
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